

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
SHERMAN DIVISION**

**MORRIS ROUTING TECHNOLOGIES,
LLC,**

Plaintiff,

v.

**SAMSUNG ELECTRONICS CO., LTD;
SAMSUNG ELECTRONICS AMERICA,
INC.; AND SAMSUNG RESEARCH
AMERICA, INC.**

Defendants.

Case No. 4:24-cv-624

JURY TRIAL DEMANDED

**SAMSUNG ELECTRONICS CO., LTD, SAMSUNG ELECTRONICS
AMERICA, INC., AND SAMSUNG RESEARCH AMERICA, INC.'S
ANSWER TO MORRIS ROUTING TECHNOLOGIES, LLC'S
FIRST AMENDED COMPLAINT FOR PATENT INFRINGEMENT**

Defendants Samsung Electronics Co., Ltd. (“SEC”), Samsung Electronics America, Inc. (“SEA”), and Samsung Research America, Inc. (“SRA”) (collectively, “Samsung”), by and through their undersigned counsel, submit their Answer to the First Amended Complaint filed by Plaintiff Morris Routing Technologies, LLC (“Morris Routing”) on October 9, 2024 (Dkt. 12). Samsung reserves the right to amend this Answer when and if it becomes appropriate to do so. Except as specifically admitted below, Samsung denies the allegations of the First Amended Complaint.

NATURE OF THE ACTION¹

1. Samsung admits that the Complaint purports to be an action for patent infringement arising under the patent laws of the United States, 35 U.S.C. §§ 1, *et seq.* Samsung specifically denies that it has committed or is committing any act of patent infringement. Samsung denies any remaining allegations of paragraph 1.

THE PARTIES

2. Samsung lacks sufficient knowledge or information to form a belief about the truth of the allegations in paragraph 2 and, therefore, denies them.

3. Samsung admits that SEC is a company organized and existing under the laws of the Republic of Korea, with its principal place of business at 129, Samsung-ro, Maetan-3dong, Yeongtong-gu, Suwon-si, Gyeonggi-do, 16677, Republic of Korea. Paragraph 3 contains legal conclusions to which no response is required. Samsung denies the remaining allegations of paragraph 3.

¹ Samsung adopts the headings as found in the First Amended Complaint as a matter of convenience but does not necessarily admit the accuracy of any express or implied meaning of such headings.

4. Samsung admits that SEA is a corporation organized under the laws of New York. Samsung admits that SEA has a registered agent, CT Corporation System, located at 1999 Bryan St., Ste. 900, Dallas, Texas 75201. Samsung admits that SEA is registered to do business in Texas under File Number 0011028006 and that June 10, 1996 is the effective registration date. Samsung admits that SEA is a wholly-owned subsidiary of SEC. Samsung denies any remaining allegations of paragraph 4.

5. Samsung admits that SRA is a corporation organized under the laws of California. Samsung admits that SRA has a registered agent, CT Corporation System, located at 1999 Bryan St., Ste. 900, Dallas, Texas 75201. Samsung admits that SRA is registered to do business in Texas under File Number 0801541089 and that January 26, 2012 is the effective registration date. Samsung admits that SRA is a wholly-owned subsidiary of SEA and, thus, SEC. Samsung denies any remaining allegations of paragraph 5.

JURISDICTION AND VENUE

6. Defendants admit that this action purports to be an action for patent infringement that arises under the patent laws of the United States, Title 35 of the United States Code. Samsung denies any remaining allegations of paragraph 6.

7. Paragraph 7 states legal conclusions to which no response is required. To the extent a response is required and to the extent Morris Routing has standing and capacity to assert the Patents-in-Suit, Samsung admits that, for purposes of this action only, this Court would have subject matter jurisdiction over the allegations as pleaded under 28 U.S.C. §§ 1331 and 1338(a) but denies any such infringement as alleged by Morris Routing. Samsung denies any remaining allegations of paragraph 7.

8. Paragraph 8 states legal conclusions to which no response is required. To the extent a response is required, Samsung will not contest, for purposes of this case only, that venue

is proper in this District but denies that venue is either convenient or in the interest of justice under 28 U.S.C. § 1404(a). Samsung further reserves the right to move to dismiss and/or seek a transfer pursuant to 28 U.S.C. §§ 1404 and 1406. Samsung denies any remaining allegations of paragraph 8.

9. Paragraph 9 states legal conclusions to which no response is required. To the extent a response is required, for the purposes of this action only, Samsung will not challenge personal jurisdiction in the Eastern District of Texas. Samsung denies any remaining allegations of paragraph 9.

10. Paragraph 10 states legal conclusions to which no response is required. To the extent a response is required, for the purposes of this action only, Samsung will not challenge personal jurisdiction in the Eastern District of Texas. Samsung admits that SEA and SRA are registered to do business in Texas and maintain an agent authorized to receive service of process within Texas. Samsung admits that SEA and SRA are subsidiaries of SEC. Samsung denies any allegation of infringement by Morris Routing. Samsung denies any remaining allegations of paragraph 10.

11. Paragraph 11 states legal conclusions to which no response is required. To the extent a response is required, Samsung will not contest, for purposes of this case only, that venue is proper in this District but denies that venue is either convenient or in the interest of justice under 28 U.S.C. § 1404(a). Samsung further reserves the right to move to dismiss and/or seek a transfer pursuant to 28 U.S.C. §§ 1404 and 1406. Samsung admits that SEA maintains a place of business at 6625 Excellence Way, Plano, Texas 75023. Samsung admits that the website <https://news.samsung.com/us/samsung-electronics-america-open-flagship-north-texas-campus/> purports to contain statements as stated therein. Samsung admits that the website

<https://www.dallasnews.com/business/retail/2023/01/06/samsung-growing-in-north-texas-with-offices-in-plano-and-coppell-warehouse> purports to contain statements as stated therein. To the extent the Complaint mischaracterizes the websites, Samsung denies the same. Samsung denies any allegation of infringement by Morris Routing. Samsung denies any remaining allegations of paragraph 11.

12. Samsung admits that the website <https://sra.samsung.com/locations/#loc-431> purports to contain statements as stated therein. Samsung admits that the website <https://sra.samsung.com/research-area/next-generation-communications/> purports to contain statements as stated therein. To the extent the Complaint mischaracterizes the websites, Samsung denies the same. Samsung admits that SRA maintains a place of business at 6105 Tennyson Pkwy, Plano, Texas 75024. Samsung denies any remaining allegations of paragraph 12.

13. Paragraph 13 states legal conclusions to which no response is required. To the extent a response is required, Samsung admits that SEC, SEA, and SRA did not contest whether venue is proper in the actions in which each was a named defendant listed in paragraph 13 of Morris Routing's First Amended Complaint, solely for the purposes of those actions only. Samsung denies any remaining allegations of paragraph 13.

14. Samsung denies the allegations of paragraph 14.

BACKGROUND

The [Alleged] Inventions of the Patents-in-Suit

15. Samsung admits that Exhibit A purports to be a copy of the '335 patent. Samsung admits that Exhibit B purports to be a copy of the '788 patent. Samsung admits that Exhibit C purports to be a copy of the '594 patent. Samsung admits that Exhibit D purports to be a copy of the '150 patent. Samsung admits that Exhibit E purports to be a copy of the '164 patent. Samsung admits that Exhibit F purports to be a copy of the '306 patent. Samsung admits that

Exhibit G purports to be a copy of the '660 patent. Samsung admits that Exhibit H purports to be a copy of the '042 patent. Samsung admits that, on their faces, the '335, '788, '594, '150, '164, '306, '660, '042 (collectively, the "Patents-in-Suit") list Mr. Robert Paul Morris as an alleged inventor. Samsung lacks knowledge or information sufficient to form a belief about the truth of whether Mr. Robert Paul Morris is the inventor of the Patents-In-Suit, and therefore denies this allegation. Samsung denies any remaining allegations of paragraph 15.

16. Samsung lacks knowledge or information sufficient to form a belief about the truth of the allegations of paragraph 16, and therefore denies them.

17. Samsung lacks knowledge or information sufficient to form a belief about the truth of the allegations of paragraph 17, and therefore denies them.

18. Samsung lacks knowledge or information sufficient to form a belief about the truth of the allegations of paragraph 18, and therefore denies them.

19. Samsung lacks knowledge or information sufficient to form a belief about the truth of the allegations of paragraph 19, and therefore denies them.

20. Samsung lacks knowledge or information sufficient to form a belief about the truth of the allegations of paragraph 20, and therefore denies them.

21. Samsung lacks knowledge or information sufficient to form a belief about the truth of the allegations of paragraph 21, and therefore denies them.

22. Samsung lacks knowledge or information sufficient to form a belief about the truth of the allegations of paragraph 22, and therefore denies them.

23. Samsung lacks knowledge or information sufficient to form a belief about the truth of the allegations of paragraph 23, and therefore denies them.

24. Samsung lacks knowledge or information sufficient to form a belief about the truth of the allegations of paragraph 24, and therefore denies them.

[Alleged] Advantage Over the Prior Art

25. Samsung denies the allegations of paragraph 25.

26. Samsung denies the allegations of paragraph 26.

27. Samsung denies the allegations of paragraph 27.

28. Samsung denies the allegations of paragraph 28.

29. Samsung admits that the website https://www.segment-routing.net/images/ACG_Segment_Routing_201808.pdf purports to contain statements as stated therein. Samsung admits that the websites https://research.samsung.com/blog/Network_Slicing%E2%80%93Service-Oriented_Network_Architecture_for_Industry_Verticals; https://images.samsung.com/is/content/samsung/assets/global/business/networks/insights/white-papers/samsungs-network-slicing-powers-profitable-5g/Samsung-Network-Slicing-Solution-Brief_r1.pdf; https://images.samsung.com/is/content/samsung/assets/global/business/networks/insights/white-paper/network-slicing/200420_Samsung_Network_Slicing_Final.pdf; and <https://www.ericsson.com/en/blog/2023/5/bright-future-of-srv6> purport to contain statements as stated therein. To the extent the Complaint mischaracterizes the websites, Samsung denies the same. Samsung denies the remaining allegations of paragraph 29.

[Alleged] Technological Innovation

30. Paragraph 30 contains legal conclusions to which no response is required. To the extent a response is required, Samsung denies the allegations of paragraph 30.

31. Paragraph 31 contains legal conclusions to which no response is required. To the extent a response is required, Samsung denies the allegations of paragraph 31.

32. Paragraph 32 contains legal conclusions to which no response is required. To the extent a response is required, Samsung denies the allegations of paragraph 32.

33. Paragraph 33 contains legal conclusions to which no response is required. To the extent a response is required, Samsung denies the allegations of paragraph 33.

34. Paragraph 34 contains legal conclusions to which no response is required. To the extent a response is required, Samsung denies the allegations of paragraph 34.

35. Paragraph 35 contains legal conclusions to which no response is required. To the extent a response is required, Samsung denies the allegations of paragraph 35.

Internet Engineering Task Force (IETF) and Standard Setting Organizations

36. Samsung admits that the IETF purports to be organized as a standards setting organization. Samsung admits that the website <https://www.ietf.org/process/rfcs/> purports to contain statements as stated therein. To the extent the Complaint mischaracterizes the website, Samsung denies the same. Samsung lacks knowledge or information sufficient to form a belief about the truth of the remaining allegations of paragraph 36, and therefore denies them.

37. Samsung lacks knowledge or information sufficient to form a belief about the truth of the allegations of paragraph 37, and therefore denies them.

38. Samsung admits that the website <https://datatracker.ietf.org/doc/rfc8402/> purports to contain statements as stated therein. To the extent the Complaint mischaracterizes the website, Samsung denies the same. Samsung lacks knowledge or information sufficient to form a belief about the truth of the remaining allegations of paragraph 38, and therefore denies them.

39. Samsung admits that the website <https://datatracker.ietf.org/doc/html/rfc8660> purports to contain statements as stated therein. To the extent the Complaint mischaracterizes the website, Samsung denies the same. Samsung lacks knowledge or information sufficient to form a belief about the truth of the remaining allegations of paragraph 39, and therefore denies them.

40. Samsung admits that the website <https://datatracker.ietf.org/doc/html/rfc8663> purports to contain statements as stated therein. To the extent the Complaint mischaracterizes the website, Samsung denies the same. Samsung lacks knowledge or information sufficient to form a belief about the truth of the remaining allegations of paragraph 40, and therefore denies them.

41. Samsung admits that the website <https://datatracker.ietf.org/doc/html/rfc8754> purports to contain statements as stated therein. To the extent the Complaint mischaracterizes the website, Samsung denies the same. Samsung lacks knowledge or information sufficient to form a belief about the truth of the remaining allegations of paragraph 41, and therefore denies them.

42. Samsung admits that the website <https://datatracker.ietf.org/doc/html/rfc8986> purports to contain statements as stated therein. To the extent the Complaint mischaracterizes the website, Samsung denies the same. Samsung lacks knowledge or information sufficient to form a belief about the truth of the remaining allegations of paragraph 42, and therefore denies them.

43. Samsung admits that the website <https://datatracker.ietf.org/doc/html/rfc9256> purports to contain statements as stated therein. To the extent the Complaint mischaracterizes the website, Samsung denies the same. Samsung lacks knowledge or information sufficient to form a belief about the truth of the remaining allegations of paragraph 43, and therefore denies them.

44. Samsung admits that the website <https://datatracker.ietf.org/doc/html/rfc9352> purports to contain statements as stated therein. To the extent the Complaint mischaracterizes the website, Samsung denies the same. Samsung lacks knowledge or information sufficient to form a belief about the truth of the remaining allegations of paragraph 44, and therefore denies them.

45. Samsung admits that the websites <https://www.samsung.com/global/business/networks/solutions/network-slicing/> and https://images.samsung.com/is/content/samsung/assets/global/business/networks/insights/white-paper/network-slicing/200420_Samsung_Network_

Slicing_Final.pdf purport to contain statements as stated therein. To the extent the Complaint mischaracterizes these websites, Samsung denies the same. This paragraph contains allegations regarding “Samsung” without specifying the entity to which it refers and Samsung therefore lacks knowledge or information sufficient to form a belief about the truth of the remaining allegations of paragraph 45, and therefore denies them.

46. Samsung admits that the 3GPP is a standard setting organization that deals with mobile telecommunications, including 5G. Samsung admits that the websites <https://www.3gpp.org/about-us/introducing-3gpp>; https://www.3gpp.org/ftp/Information/presentations/Newcomers_quick-start/Newcomers_slides.pdf; and <https://webapp.etsi.org/3gppmembership/Results.asp?SortMember=Name&DirMember=ASC&SortPartner=Name&DirPartner=ASC&SortMarket=Name&DirMarket=ASC&SortObserver=Name&DirObserver=ASC&SortGuest=Name&DirGuest=ASC&Name=samsung&search=Search> purport to contain statements as stated therein. To the extent the Complaint mischaracterizes these websites, Samsung denies the same. Samsung lacks knowledge or information sufficient to form a belief about the truth of the remaining allegations of paragraph 46, and therefore denies them.

47. Samsung admits that the website <https://www.o-ran.org/membership> purports to contain statements as stated therein. Samsung admits that the website https://assets-global.website-files.com/60b4ffd4ca081979751b5ed2/64bee579b5449cafb9f0f889_Governance%20of%20O-RAN%20ALLIANCE%20e.V.%20in%20Compliance%20with%20WTO%20Principles-v02.pdf purports to contain statements as stated therein. Samsung admits that the website <https://www.fierce-network.com/sponsored/vran-open-ran-and-ai-take-center-stage-mwc-2024> purports to contain statements as stated therein. To the extent the Complaint

mischaracterizes these websites, Samsung denies the same. This paragraph contains allegations regarding “Samsung” without specifying the entity to which it refers and Samsung therefore lacks knowledge or information sufficient to form a belief about the truth of the remaining allegations of paragraph 47, and therefore denies them.

48. Samsung admits that ETSI is a standard setting organization. Samsung admits that the website https://www.3gpp.org/ftp/Information/presentations/Newcomers_quick-start/Newcomers_slides.pdf purports to contain statements as stated therein. Samsung admits that the website <https://www.etsi.org/standards/types-of-standards> purports to contain statements as stated therein. Samsung admits that the website <https://www.etsi.org/membership> purports to contain statements as stated therein. To the extent the Complaint mischaracterizes these websites, Samsung denies the same. This paragraph contains allegations regarding “Samsung” without specifying the entity to which it refers and Samsung therefore lacks knowledge or information sufficient to form a belief about the truth of the remaining allegations of paragraph 48, and therefore denies them.

49. This paragraph purports to quote from a filing from a case No. 2:23-cv-00488, Dkt. 38 at 7 (¶ 30) (E.D. Tex. Mar. 25, 2024) that neither lists any Samsung entity as defendant, nor does it contain 38 docket entries and, on that basis, Samsung denies the allegations of paragraph 49.

50. This paragraph purports to quote from a filing from a case No. 2:23-cv-00488, Dkt. 38 at 24 (¶ 23 counterclaims) (E.D. Tex. Mar. 25, 2024) that neither lists any Samsung entity as defendant, nor does it contain 38 docket entries and, on that basis, Samsung denies the allegations of paragraph 50.

51. Samsung admits that the website https://www.etsi.org/deliver/etsi_ts/128500_128599/128541/18.07.00_60/ts_128541v180700p.pdf purports to contain statements as stated therein. To the extent the Complaint mischaracterizes the website, Samsung denies the same. Samsung lacks knowledge or information sufficient to form a belief about the truth of the remaining allegations of paragraph 51, and therefore denies them.

52. Samsung admits that the website <https://www.etsi.org/committee/1696-f5g> purports to contain statements as stated therein. To the extent the Complaint mischaracterizes the website, Samsung denies the same. Samsung lacks knowledge or information sufficient to form a belief about the truth of the remaining allegations of paragraph 52, and therefore denies them.

53. Samsung admits that the website https://www.etsi.org/deliver/etsi_gs/F5G/001_099/014/01.01.01_60/gs_F5G014v010101p.pdf purports to contain statements as stated therein. Samsung admits that the website <https://portal.etsi.org/Services/editHelp/Search/FAQs/Normative-informative-references> purports to contain statements as stated therein. To the extent the Complaint mischaracterizes these websites, Samsung denies the same. Samsung lacks knowledge or information sufficient to form a belief about the truth of the remaining allegations of paragraph 53, and therefore denies them.

54. Samsung admits that the website https://www.etsi.org/deliver/etsi_gs/F5G/001_099/014/01.01.01_60/gs_F5G014v010101p.pdf purports to contain statements as stated therein. To the extent the Complaint mischaracterizes the website, Samsung denies the same. Samsung lacks knowledge or information sufficient to form a belief about the truth of the remaining allegations of paragraph 54, and therefore denies them.

55. Samsung admits that the website https://www.etsi.org/deliver/etsi_gs/NFV-TST/001_099/009/03.04.01_60/gs_NFV-TST009v030401p.pdf purports to contain statements as

stated therein. Samsung admits that the website <https://portal.etsi.org/TB-SiteMap/NFV/NFV-List-members> purports to contain statements as stated therein. To the extent the Complaint mischaracterizes these websites, Samsung denies the same. Samsung denies that SEC, SEA, or SRA are listed as members. Samsung lacks knowledge or information sufficient to form a belief about the truth of the remaining allegations of paragraph 55, and therefore denies them.

56. Samsung admits that the website https://www.etsi.org/deliver/etsi_gr/NFV-IFA/001_099/035/05.01.01_60/gr_NFVIFA035v050101p.pdf purports to contain statements as stated therein. To the extent the Complaint mischaracterizes the website, Samsung denies the same. Samsung lacks knowledge or information sufficient to form a belief about the truth of the remaining allegations of paragraph 56, and therefore denies them.

57. Samsung lacks knowledge or information sufficient to form a belief about the truth of the allegations regarding the inoperative web address <https://opennetworking.org/member-listing/> and therefore denies those allegations. Samsung admits that the website <https://www.datacenterknowledge.com/open-source-software/verizon-latest-telco-to-join-onos-open-source-sdn-project> purports to contain statements as stated therein. Samsung admits that the website <https://docs.sd-fabric.org/master/specification.html> purports to contain statements as stated therein. To the extent the Complaint mischaracterizes these websites, Samsung denies the same. Samsung lacks knowledge or information sufficient to form a belief about the truth of the remaining allegations of paragraph 57, and therefore denies them.

58. Samsung admits that the websites <https://wiki.onosproject.org/pages/viewpage.action?pageId=39813572>; <https://wiki.onosproject.org/display/ONOS/1.15-SR+Routing>; and <https://www.samsung.com/global/business/networks/solutions/network-slicing/> purport to contain statements as stated therein. Samsung admits that the website

<https://www.samsung.com/global/business/networks/insights/press-release/0721-samsung-expands-its-lineup-of-sdn-solutions/> purports to contain statements as stated therein. To the extent the Complaint mischaracterizes these websites, Samsung denies the same. This paragraph contains allegations regarding “Samsung” without specifying the entity to which it refers and Samsung therefore lacks knowledge or information sufficient to form a belief about the truth of the remaining allegations of paragraph 58, and therefore denies them.

59. Samsung admits that the websites <https://wiki.onosproject.org/pages/viewpage.action?pageId=39813572>; <https://wiki.onosproject.org/display/ONOS/Master-Segment+Routing>; and <https://www.samsung.com/global/business/networks/solutions/network-slicing/> purport to contain statements as stated therein. To the extent the Complaint mischaracterizes these websites, Samsung denies the same. This paragraph contains allegations regarding “Samsung” without specifying the entity to which it refers and Samsung therefore lacks knowledge or information sufficient to form a belief about the truth of the remaining allegations of paragraph 59, and therefore denies them.

Samsung’s Accused Instrumentalities

60. Samsung denies the allegations of paragraph 60.

61. Samsung denies the allegations of paragraph 61.

62. Samsung denies the allegations of paragraph 62.

63. Samsung denies the allegations of paragraph 63.

64. Samsung denies the allegations of paragraph 64.

COUNT I – ALLEGED INFRINGEMENT OF U.S. PATENT NO. 10,419,335

65. Samsung incorporates by reference and realleges the foregoing paragraphs as if fully set forth herein.

66. Samsung admits that, on its face, the '335 patent is titled "REGION SCOPE-SPECIFIC OUTSIDE-SCOPE IDENTIFIER-EQUIPPED ROUTING METHODS, SYSTEMS, AND COMPUTER PROGRAM PRODUCTS" and purports to have been issued on September 17, 2019. Samsung denies the remaining allegations of paragraph 66.

67. Samsung lacks knowledge or information sufficient to form a belief about the truth of the allegations of paragraph 67, and therefore denies them.

68. Samsung admits that Exhibit A purports to be a copy of the '335 patent. Samsung denies the remaining allegations of paragraph 68.

69. Samsung denies the allegations of paragraph 69.

70. Paragraph 70 states legal conclusions to which no response is required. To the extent a response is required, Morris Routing purports to present in paragraph 70 and Exhibit I an infringement allegation of claim 1 of the '335 patent. Based on the information provided in Morris Routing's First Amended Complaint, Morris Routing has not shown any acts of infringement by Samsung, and Samsung therefore denies the allegations of paragraph 70.

71. Samsung denies the allegations of paragraph 71.

72. Samsung denies the allegations of paragraph 72.

COUNT II – ALLEGED INFRINGEMENT OF U.S. PATENT NO. 10,476,788

73. Samsung incorporates by reference and realleges the foregoing paragraphs as if fully set forth herein.

74. Samsung admits that, on its face, the '788 patent is titled "OUTSIDE-SCOPE IDENTIFIER-EQUIPPED ROUTING METHODS, SYSTEMS, AND COMPUTER PROGRAM PRODUCTS" and purports to have been issued on November 12, 2019. Samsung denies the remaining allegations of paragraph 74.

75. Samsung lacks knowledge or information sufficient to form a belief about the truth of the remaining allegations of paragraph 75, and therefore denies them.

76. Samsung admits that Exhibit B appears to be a copy of the '788 patent. Samsung denies the remaining allegations of paragraph 76.

77. Samsung denies the allegations of paragraph 77.

78. Paragraph 78 states legal conclusions to which no response is required. To the extent a response is required, Morris Routing purports to present in paragraph 78 and Exhibit J an infringement allegation of claim 1 of the '788 patent. Based on the information provided in Morris Routing's First Amended Complaint, Morris Routing has not shown any acts of infringement by Samsung, and Samsung therefore denies the allegations of paragraph 78.

79. Samsung denies the allegations of paragraph 79.

80. Samsung denies the allegations of paragraph 80.

COUNT III – ALLEGED INFRINGEMENT OF U.S. PATENT NO. 10,594,594

81. Samsung incorporates by reference and realleges the foregoing paragraphs as if fully set forth herein.

82. Samsung admits that, on its face, the '594 patent is titled "ROUTING METHODS, SYSTEMS, AND COMPUTER PROGRAM PRODUCTS" and purports to have issued on March 17, 2020. Samsung denies the remaining allegations of paragraph 82.

83. Samsung lacks knowledge or information sufficient to form a belief about the truth of the allegations of paragraph 83, and therefore denies them.

84. Samsung admits that Exhibit C purports to be a copy of the '594 patent. Samsung denies the remaining allegations of paragraph 84.

85. Samsung denies the allegations of paragraph 85.

86. Paragraph 86 states legal conclusions to which no response is required. To the extent a response is required, Morris Routing purports to present in paragraph 86 and Exhibit K an infringement allegation of claim 1 of the '594 patent. Based on the information provided in Morris Routing's First Amended Complaint, Morris Routing has not shown any acts of infringement by Samsung, and Samsung therefore denies the allegations of paragraph 86.

87. Samsung denies the allegations of paragraph 87.

88. Samsung denies the allegations of paragraph 88.

COUNT IV – ALLEGED INFRINGEMENT OF U.S. PATENT NO. 10,652,150

89. Samsung incorporates by reference and realleges the foregoing paragraphs as if fully set forth herein.

90. Samsung admits that, on its face, the '150 patent is titled "ROUTING METHODS, SYSTEMS, AND COMPUTER PROGRAM PRODUCTS" and purports to have been issued on May 12, 2020. Samsung denies the remaining allegations of paragraph 90.

91. Samsung lacks knowledge or information sufficient to form a belief about the truth of the allegations of paragraph 91, and therefore denies them.

92. Samsung admits that Exhibit D purports to be a copy of the '150 patent. Samsung denies the remaining allegations of paragraph 92.

93. Samsung denies the allegations of paragraph 93.

94. Paragraph 94 states legal conclusions to which no response is required. To the extent a response is required, Morris Routing purports to present in paragraph 94 and Exhibit L an infringement allegation of claim 1 of the '150 patent. Based on the information provided in Morris Routing's First Amended Complaint, Morris Routing has not shown any acts of infringement by Samsung, and Samsung therefore denies the allegations of paragraph 94.

95. Samsung denies the allegations of paragraph 95.

96. Samsung denies the allegations of paragraph 96.

COUNT V – ALLEGED INFRINGEMENT OF U.S. PATENT NO. 10,721,164

97. Samsung incorporates by reference and realleges the foregoing paragraphs as if fully set forth herein.

98. Samsung admits that, on its face, the '164 patent is titled "ROUTING METHODS, SYSTEMS, AND COMPUTER PROGRAM PRODUCTS WITH MULTIPLE SEQUENCES OF IDENTIFIERS" and purports to have been issued on July 21, 2020. Samsung denies the remaining allegations of paragraph 98.

99. Samsung lacks knowledge or information sufficient to form a belief about the truth of the allegations of paragraph 99, and therefore denies them.

100. Samsung admits that Exhibit E purports to be a copy of the '164 patent. Samsung denies the remaining allegations of paragraph 100.

101. Samsung denies the allegations of paragraph 101.

102. Paragraph 102 states legal conclusions to which no response is required. To the extent a response is required, Morris Routing purports to present in paragraph 102 and Exhibit M an infringement allegation of claim 1 of the '164 patent. Based on the information provided in Morris Routing's First Amended Complaint, Morris Routing has not shown any acts of infringement by Samsung, and Samsung therefore denies the allegations of paragraph 102.

103. Samsung denies the allegations of paragraph 103.

104. Samsung denies the allegations of paragraph 104.

COUNT VI – ALLEGED INFRINGEMENT OF U.S. PATENT NO. 10,735,306

105. Samsung incorporates by reference and realleges the foregoing paragraphs as if fully set forth herein.

106. Samsung admits that, on its face, the '306 patent is titled "ROUTING METHODS, SYSTEMS, AND COMPUTER PROGRAM PRODUCTS" and purports to have been issued on August 4, 2020. Samsung denies the remaining allegations of paragraph 106.

107. Samsung lacks knowledge or information sufficient to form a belief about the truth of the allegations of paragraph 107, and therefore denies them.

108. Samsung admits that Exhibit F purports to be a copy of the '306 patent. Samsung denies the remaining allegations of paragraph 108.

109. Samsung denies the allegations of paragraph 109.

110. Paragraph 110 states legal conclusions to which no response is required. To the extent a response is required, Morris Routing purports to present in paragraph 110 and Exhibit N an infringement allegation of claim 27 of the '306 patent. Based on the information provided in Morris Routing's First Amended Complaint, Morris Routing has not shown any acts of infringement by Samsung, and Samsung therefore denies the allegations of paragraph 110.

111. Samsung denies the allegations of paragraph 111.

112. Samsung denies the allegations of paragraph 112.

COUNT VII – ALLEGED INFRINGEMENT OF U.S. PATENT NO. 11,196,660

113. Samsung incorporates by reference and realleges the foregoing paragraphs as if fully set forth herein.

114. Samsung admits that, on its face, the '660 patent is titled "ROUTING METHODS, SYSTEMS, AND COMPUTER PROGRAM PRODUCTS" and purports to have been issued on December 7, 2021. Samsung denies the remaining allegations of paragraph 114.

115. Samsung lacks knowledge or information sufficient to form a belief about the truth of the allegations of paragraph 115, and therefore denies them.

116. Samsung admits that Exhibit G purports to be a copy of the '660 patent. Samsung denies the remaining allegations of paragraph 116.

117. Samsung denies the allegations of paragraph 117.

118. Paragraph 118 states legal conclusions to which no response is required. To the extent a response is required, Morris Routing purports to present in paragraph 118 and Exhibit O an infringement allegation of claim 11 of the '660 patent. Based on the information provided in Morris Routing's First Amended Complaint, Morris Routing has not shown any acts of infringement by Samsung, and Samsung therefore denies the allegations of paragraph 118.

119. Samsung denies the allegations of paragraph 119.

120. Samsung denies the allegations of paragraph 120.

COUNT VIII – ALLEGED INFRINGEMENT OF U.S. PATENT NO. 12,058,042

121. Samsung incorporates by reference and realleges the foregoing paragraphs as if fully set forth herein.

122. Samsung admits that, on its face, the '042 patent is titled "ROUTING METHODS, SYSTEMS, AND COMPUTER PROGRAM PRODUCTS" and purports to have been issued on August 6, 2024. Samsung denies the remaining allegations of paragraph 122.

123. Samsung lacks knowledge or information sufficient to form a belief about the truth of the allegations of paragraph 123, and therefore denies them.

124. Samsung admits that Exhibit H purports to be a copy of the '042 patent. Samsung denies the remaining allegations of paragraph 124.

125. Samsung denies the allegations of paragraph 125.

126. Paragraph 126 states legal conclusions to which no response is required. To the extent a response is required, Morris Routing purports to present in paragraph 126 and Exhibit P an infringement allegation of claim 1 of the '042 patent. Based on the information provided in

Morris Routing's First Amended Complaint, Morris Routing has not shown any acts of infringement by Samsung, and Samsung therefore denies the allegations of paragraph 126.

127. Samsung denies the allegations of paragraph 127.

128. Samsung denies the allegations of paragraph 128.

JURY DEMAND

To the extent a response is required, Samsung admits that Morris Routing's Complaint contains a request for a jury trial.

PRAYER FOR RELIEF

A response to the prayer for relief is unnecessary. To the extent a response is required, Samsung denies any allegations contained in the prayer for relief and denies that Morris Routing is entitled to any such judgment or relief, requested or otherwise.

DEFENSES

Samsung asserts the defenses below with knowledge as to their own actions and on information and belief with respect to the actions of others. By doing so, Samsung does not concede that any of the following must necessarily be pleaded as affirmative defenses or that any of the following is not already at issue by virtue of the forgoing denials. Moreover, Samsung reserves their rights to plead additional defenses as discovery into the facts of the matter warrant.

FIRST DEFENSE **(Noninfringement of the '335 Patent)**

1. Based on the information provided in Morris Routing's First Amended Complaint, Morris Routing has not shown any acts of infringement by Samsung, Samsung therefore does not directly infringe, induce the infringement, or contribute to the infringement (either literally or under the doctrine of equivalents) of any valid and/or enforceable claim of the '335 patent.

SECOND DEFENSE
(Invalidity of the '335 Patent)

2. All asserted claims of the '335 patent are invalid for failure to satisfy one or more of the conditions of patentability under the patent laws of the United States, 35 U.S.C. §§ 100, et seq., including §§ 101, 102, 103, 112, and/or 116.

THIRD DEFENSE
(Noninfringement of the '788 Patent)

3. Based on the information provided in Morris Routing's First Amended Complaint, Morris Routing has not shown any acts of infringement by Samsung, Samsung therefore does not directly infringe, induce the infringement, or contribute to the infringement (either literally or under the doctrine of equivalents) of any valid and/or enforceable claim of the '788 patent.

FOURTH DEFENSE
(Invalidity of the '788 Patent)

4. All asserted claims of the '788 patent are invalid for failure to satisfy one or more of the conditions of patentability under the patent laws of the United States, 35 U.S.C. §§ 100, et seq., including §§ 101, 102, 103, 112, and/or 116.

FIFTH DEFENSE
(Noninfringement of the '594 Patent)

5. Based on the information provided in Morris Routing's First Amended Complaint, Morris Routing has not shown any acts of infringement by Samsung, Samsung therefore does not directly infringe, induce the infringement, or contribute to the infringement (either literally or under the doctrine of equivalents) of any valid and/or enforceable claim of the '594 patent.

SIXTH DEFENSE
(Invalidity of the '594 Patent)

6. All asserted claims of the '594 patent are invalid for failure to satisfy one or more of the conditions of patentability under the patent laws of the United States, 35 U.S.C. §§ 100, et seq., including §§ 101, 102, 103, 112, and/or 116.

SEVENTH DEFENSE
(Noninfringement of the '150 Patent)

7. Based on the information provided in Morris Routing's First Amended Complaint, Morris Routing has not shown any acts of infringement by Samsung, Samsung therefore does not directly infringe, induce the infringement, or contribute to the infringement (either literally or under the doctrine of equivalents) of any valid and/or enforceable claim of the '150 patent.

EIGHTH DEFENSE
(Invalidity of the '150 Patent)

8. All asserted claims of the '150 patent are invalid for failure to satisfy one or more of the conditions of patentability under the patent laws of the United States, 35 U.S.C. §§ 100, et seq., including §§ 101, 102, 103, 112, and/or 116.

NINTH DEFENSE
(Noninfringement of the '164 Patent)

9. Based on the information provided in Morris Routing's First Amended Complaint, Morris Routing has not shown any acts of infringement by Samsung, Samsung therefore does not directly infringe, induce the infringement, or contribute to the infringement (either literally or under the doctrine of equivalents) of any valid and/or enforceable claim of the '164 patent.

TENTH DEFENSE
(Invalidity of the '164 Patent)

10. All asserted claims of the '164 patent are invalid for failure to satisfy one or more of the conditions of patentability under the patent laws of the United States, 35 U.S.C. §§ 100, et seq., including §§ 101, 102, 103, 112, and/or 116.

ELEVENTH DEFENSE
(Noninfringement of the '306 Patent)

11. Based on the information provided in Morris Routing's First Amended Complaint, Morris Routing has not shown any acts of infringement by Samsung, Samsung therefore does not directly infringe, induce the infringement, or contribute to the infringement (either literally or under the doctrine of equivalents) of any valid and/or enforceable claim of the '306 patent.

TWELFTH DEFENSE
(Invalidity of the '306 Patent)

12. All asserted claims of the '306 patent are invalid for failure to satisfy one or more of the conditions of patentability under the patent laws of the United States, 35 U.S.C. §§ 100, et seq., including §§ 101, 102, 103, 112, and/or 116.

THIRTEENTH DEFENSE
(Noninfringement of the '660 Patent)

13. Based on the information provided in Morris Routing's First Amended Complaint, Morris Routing has not shown any acts of infringement by Samsung, Samsung therefore does not directly infringe, induce the infringement, or contribute to the infringement (either literally or under the doctrine of equivalents) of any valid and/or enforceable claim of the '660 patent.

FOURTEENTH DEFENSE
(Invalidity of the '660 Patent)

14. All asserted claims of the '660 patent are invalid for failure to satisfy one or more of the conditions of patentability under the patent laws of the United States, 35 U.S.C. §§ 100, et seq., including §§ 101, 102, 103, 112, and/or 116.

FIFTEENTH DEFENSE
(Noninfringement of the '042 Patent)

15. Based on the information provided in Morris Routing's First Amended Complaint, Morris Routing has not shown any acts of infringement by Samsung, Samsung therefore does not directly infringe, induce the infringement, or contribute to the infringement (either literally or under the doctrine of equivalents) of any valid and/or enforceable claim of the '042 patent.

SIXTEENTH DEFENSE
(Invalidity of the '042 Patent)

16. All asserted claims of the '042 patent are invalid for failure to satisfy one or more of the conditions of patentability under the patent laws of the United States, 35 U.S.C. §§ 100, et seq., including §§ 101, 102, 103, 112, and/or 116.

SEVENTEENTH DEFENSE
(Failure to State a Claim)

17. Morris Routing has failed to state any claim upon which relief can be granted.

EIGHTEENTH DEFENSE
(Lack of Standing)

18. To the extent Morris Routing lacks all substantial rights to bring suit and to exclude others from practicing the claims of one or more of the '335, '788, '594, '150, '164, '306, '660, and '042 patents, Morris Routing is not entitled to relief because its claims are barred by a lack of standing.

NINETEENTH DEFENSE
(Lack of Capacity to Sue)

19. To the extent Morris Routing lacks rights to pursue claims, Morris Routing lacks the capacity to sue.

TWENTIETH DEFENSE
(Equitable Doctrines)

20. Morris Routing's claims are barred, in whole or in part, by the equitable doctrines of waiver, estoppel, misuse, acquiescence, laches, and/or unclean hands.

TWENTY-FIRST DEFENSE
(Prosecution History Estoppel and/or Doctrine of Equivalents)

21. Morris Routing's claims are barred, in whole or in part, by prosecution history estoppel and/or prosecution history disclaimer to the extent Morris Routing sufficiently alleges infringement under the doctrine of equivalents for a limitation for which it surrendered claim scope.

TWENTY-SECOND DEFENSE
(Limitation on Damages Under Section 286)

22. Morris Routing's claims for damages are barred under 35 U.S.C. § 286 to the extent Morris Routing seeks damages beyond the applicable statute of limitations.

TWENTY-THIRD DEFENSE
(Limitation on Damages Under Section 287)

23. Morris Routing did not provide notice to Samsung of the '335, '788, '594, '150, '164, '306, '660, or '042 patents prior to the filing of the Original Complaint (Dkt. 1). Morris Routing did not provide notice to Samsung of the '042 patent prior to filing of the First Amended Complaint (Dkt. 12). Samsung was not notified of any alleged infringement of the '335, '788, '594, '150, '164, '306, '660, or '042 patents prior to the filing of the Original Complaint (Dkt. 1). Samsung was not notified of any alleged infringement of the '042 patent prior to the filing of

the First Amended Complaint (Dkt. 12). Any claims for damages prior to the filing of the Complaint are barred to the extent the requirements of 35 U.S.C. § 287 have not been met.

TWENTY-FOURTH DEFENSE
(Unavailability of Pre-Suit Damages for Indirect Infringement)

24. Samsung lacked knowledge of the '335, '788, '594, '150, '164, '306, '660, and '042 patents and/or the requisite intent for indirect infringement prior to the filing of the Original Complaint (Dkt. 1). Samsung lacked knowledge of the '042 patent and/or the requisite intent for indirect infringement prior to the filing of the First Amended Complaint (Dkt. 12). Accordingly, Morris Routing is not entitled to recover any damages for any alleged indirect infringement based on any alleged acts that transpired prior to the filing of those Complaints. Nor is Morris Routing entitled to recover for any other alleged indirect infringement because Morris Routing should not prospectively allege post-filing conduct in an original complaint where Samsung lacked knowledge of the patents and intent.

TWENTY-FIFTH DEFENSE
(Extraterritoriality)

25. Morris Routing's claims of patent infringement are precluded, in whole or in part, to the extent that any accused functionality or acts are located or performed outside the United States.

TWENTY-SIXTH DEFENSE
(No Exceptional Case)

26. Any claim for an award of fees and/or costs against Samsung pursuant to 35 U.S.C. § 285 has no basis in fact or law and should be denied.

TWENTY-SEVENTH DEFENSE
(Actions of Others)

27. Morris Routing's claims are barred, in whole or in part, to the extent based on the acts of others for whom Samsung has no control.

TWENTY-EIGHTH DEFENSE
(Ensnarement)

28. To the extent Morris Routing sufficiently alleges infringement of the '335, '788, '594, '150, '164, '306, '660, and '042 patents under the doctrine of equivalents, its claims are barred under the ensnarement doctrine to the extent that Morris Routing's allegations encompass, or "ensnare," prior art.

TWENTY-NINTH DEFENSE
(License and Exhaustion)

29. Morris Routing's claims of patent infringement are barred, in whole or in part, to the extent that the alleged infringement is licensed or otherwise authorized. Morris Routing's claims of patent infringement are also barred, in whole or in part, to the extent that Morris Routing exhausted its rights and remedies as to the alleged infringement.

THIRTIETH DEFENSE
(Limitations for Sales Covered by Section 1498)

30. Morris Routing's remedies, if any, are limited under 28 U.S.C. § 1498(a) to the extent that Morris Routing accuses products that are provided, made, or used by or for the government of the United States of America.

THIRTY-FIRST DEFENSE
(No Costs)

31. Morris Routing is barred by 35 U.S.C. § 288 from recovering any costs associated with this action.

RESERVATION OF DEFENSES

Samsung reserves all affirmative defenses under Rule 8(c) of the Federal Rules of Civil Procedure, the Patent Laws of the United States, and any other defenses, at law or in equity, that may exist now or in the future be available based on discovery and further factual investigation.

Dated: November 20, 2024

Respectfully submitted,

/s/ Melissa R. Smith

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that counsel of record who are deemed to have consented to electronic services are being served with a copy of this document via the Court's CM/ECF system per Local Rule CV-5(a)(3) on November 20, 2024.

/s/ Melissa R. Smith

Melissa R. Smith